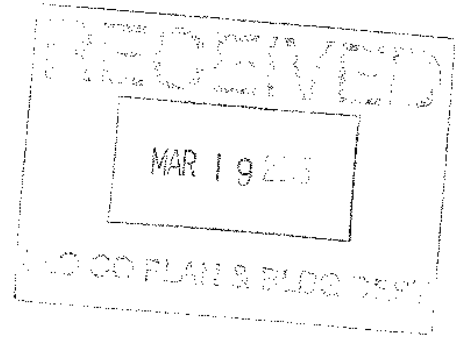




Air Pollution Control District
San Luis Obispo County



March 18, 2015

Schani Siong
SLO County Department of Planning & Building
Coastal Team/Development Review
County Government Center
San Luis Obispo, CA 93401

SUBJECT: APCD Comments Regarding DRC2014-00095 CALTRANS

Dear Ms. Siong,

Thank you for including the San Luis Obispo County Air Pollution Control District (SLOCAPCD) in the environmental review process. We have completed our review of a plan to widen Highway 1 at Sheridan Road on the Nipomo Mesa and construct a left turn lane. The plan proposes to remove approximately 480 mature eucalyptus trees. The project disturbed area is approximately 6 acres.

The following are APCD comments that are pertinent to this project.

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each.

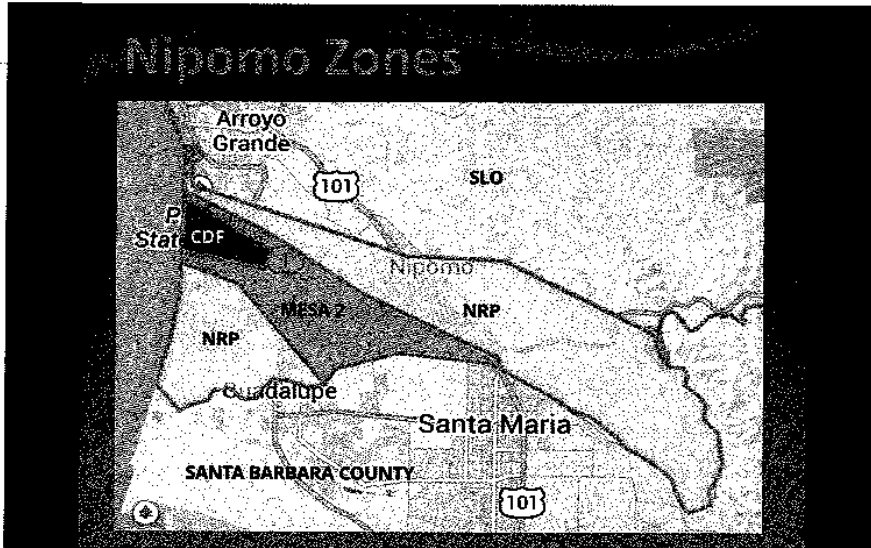
Please address the action items contained in this letter, with special attention to items that are highlighted by bold and underlined text.

Project area impacted by particulate matter

The APCD has been investigating elevated particulate levels on the Nipomo Mesa for the past decade. Studies performed by the APCD in the area have shown the source of the elevated particulate matter (PM) pollution to be windblown dust from the open sand areas of the Oceano Dunes State Vehicular Recreation Area (SVRA), and that emissions are increased by off road vehicle activity.

The data gathered from the studies provided a detailed and comprehensive picture of the path, concentration gradient and influence of different wind conditions on the dust plume. Most dust episodes showed a remarkable similarity in plume extent and concentration gradient, with the main variable being the severity of the event. The APCD defined four zones of dust plume influence as labeled below, CDF, MESA2, NRP and SLO:

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The darker colors signify the typical location of the dust plume and the greater impacts. The CDF zone receives the most significant impacts, with roughly 60-95 exceedances of the state PM10 standard each year. MESA2 has roughly 30-60 exceedances annually and the NRP zone has roughly 0-20 exceedances annually. This proposed project is located partly in the CDF zone and partly in the MESA2 zone, the zones with the greatest dust impacts on Nipomo Mesa.

The proposed removal of 480 Eucalyptus trees is of great concern to SLOCAPCD due to the health benefits they provide to residents by mitigating dust impacts.

CONSTRUCTION PHASE IMPACTS - Insufficient Information

Sufficient information regarding the construction phase emissions for this project was not provided to quantify the air quality impact. **An air quality impact assessment of the construction phase needs to be completed that quantifies the impacts, and incorporates mitigation if impacts are above the APCD's thresholds** (see Table 2-1 of the 2012 CEQA Air Quality Handbook).

At a minimum, the construction phase air quality assessment needs to document the following information/assumptions that will be used in the modeling:

- Area of disturbance;
- An estimation of the number and type of construction equipment operating throughout the construction phase of the project;
- Identify sensitive receptors within 1000 feet of the construction boundary (see Section 2.1.1 in the CEQA Air Quality Handbook);
- If project includes cut and fill and/or hauling (on-site or off-site), then the assessment should identify the fleet mix, hauling route (minimize sensitive receptor impact) and number of trips per day;
- Time frame for the operation of construction equipment during the project, which includes:
 - Estimated construction schedule for all phases including anticipated phase overlaps;
 - An estimation of the number of daily operating hours for the equipment;
 - An estimation of equipment that would operate simultaneously on a given day;
- Total square footage of the property;

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- Total square footage of existing trees and number and square footage of trees to be removed;
- Square footage of open space/landscaped area; and
- Square footage of roads/driveways.

Tree Removal

Caltrans proposes to remove approximately 480 eucalyptus trees as part of the project (6-55 inches in diameter - DBH). This proposed project is partly in the CDF zone and partly in the MESA2 zone, which is significantly impacted by blowing dust as discussed above. The existing eucalyptus trees mitigate the blowing dust impacts and the removal of trees could create negative health consequences for the residents in the area.

SLOCAPCD strongly recommends that Caltrans not remove any of the trees. If Caltrans chooses to move forward with any tree removal, the SLOCAPCD recommends that Caltrans limit this action to a small fraction of the 480 trees slated for removal and maintain the density of the foliage so that the dust mitigation is not reduced. SLOCAPCD recommends planting native tree species to replace any plants or trees slated for removal. Tree planting off-site is acceptable as long it is located in the CDF zone and the off-site mitigation plan is approved by the SLOCAPCD. Research has shown that some species are more efficient at mitigating particulate emissions, such as some types of conifer trees. The SLOCAPCD recommends removing the vegetation only after the new vegetation has reached maturity and has mass similar to the removed vegetation. After any replanting, the trees should be maintained.

Dust Control Measures

Construction activities can generate fugitive dust, which could be a nuisance to local residents and businesses in close proximity to the proposed construction site. **Projects with grading areas that are greater than 4-acres or are within 1,000 feet of any sensitive receptor shall implement the following mitigation measures to manage fugitive dust emissions such that they do not exceed the SLOCAPCD's 20% opacity limit (SLOCAPCD Rule 401) or prompt nuisance violations (SLOCAPCD Rule 402):**

- a. Reduce the amount of the disturbed area where possible;
- b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOCAPCD's limit of 20% opacity for greater than 3 minutes in any 60 minute period. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible;
- c. All dirt stock pile areas should be sprayed daily and covered with tarps or other dust barriers as needed;
- d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible, following completion of any soil disturbing activities;
- e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established;
- f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOCAPCD;

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- g. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible;
- h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
- i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114;
- j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;
- k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers shall use reclaimed water where feasible. Roads shall be pre-wetted prior to sweeping when feasible;
- l. All PM₁₀ mitigation measures required should be shown on grading and building plans; and,
- m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the SLOCAPCD's limit of 20% opacity for greater than 3 minutes in any 60 minute period. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOCAPCD Compliance Division prior to the start of any grading, earthwork or demolition.

Water use as mitigation during a drought

Since water use is a concern due to drought conditions, the contractor shall consider the use of a SLOCAPCD-approved dust suppressant(s) to reduce the amount of water used for fugitive dust control. For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook that can be accessed at the following website: <http://slocleanair.org/business/landuseceqa.php>.

Standard Mitigation Measures for Construction Equipment

If the air quality impact assessment indicates an exceedance of SLOCAPCD's CEQA construction emission thresholds, the following standard construction equipment mitigation measures for reducing nitrogen oxide (NO_x), reactive organic gases (ROG), and diesel particulate matter (DPM) emissions may be necessary, as stated in section 2.3.1 of the SLOCAPCD's 2012 CEQA Handbook.

These measures are applicable to all projects where construction phase emissions exceed APCD thresholds:

- Maintain all construction equipment in proper tune according to manufacturer's specifications;
- Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
- Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
- Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
- Construction or trucking companies that do not have engines in their fleet that meet the engine standards may be eligible for alternative compliance scenarios (discuss with SLOCAPCD staff);

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- All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit;
- Diesel idling within 1,000 feet of sensitive receptors is not permitted;
- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
- Electrify equipment when feasible;
- Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and,
- Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.

Construction Activity Management Plan

If the air quality impact assessment indicates the estimated construction emissions from the project fleet are expected to exceed the SLOCAPCD's Quarterly Tier 2 thresholds of significance (ROG+NO_x and/or PM), after the standard measures and BACT measures are factored into the estimation, then an APCD approved CAMP and off-site mitigation needs to be implemented in order to reduce potential air quality impacts to a level of significance. See the SLOCAPCD's 2012 CEQA Handbooks Technical Appendix 4.5 for CAMP Guidelines. **The CAMP should be submitted to the SLOCAPCD for review and approval prior to the start of construction and should include, but not be limited to, the following elements:**

- A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures that were listed above in the "dust control measures" section;
- Tabulation of on and off-road construction equipment (age, horse-power and miles and/or hours of operation);
- Schedule construction truck trips during non-peak hours to reduce peak hour emissions;
- Limit the length of the construction work-day period, if necessary; and,
- Phase construction activities, if appropriate.

Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an SLOCAPCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the SLOCAPCD's 2012 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Internal combustion engines;
- Rock and pavement crushing;
- Unconfined abrasive blasting operations;
- Tub grinders;
- Trommel screens; and,
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc).

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To minimize potential delays, prior to the start of the project, please contact the SLOCAPCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

Naturally Occurring Asbestos

Naturally Occurring Asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. SLOCAPCD has identified areas throughout the County where NOA may be present (see the SLOCAPCD's 2012 CEQA Handbook, Technical Appendix 4.4). If the project site is located in a candidate area for Naturally Occurring Asbestos (NOA), the following requirements apply. Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (93105), **prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if the area disturbed is exempt from the regulation. An exemption request must be filed with the APCD.** If the site is not exempt from the requirements of the regulation, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. More information on NOA can be found at <http://www.slocleanair.org/business/asbestos.php>.

Demolition of Asbestos Containing Materials

Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during any construction phase demolition or the disturbance, demolition, or relocation of above or below ground utility pipes/pipelines (e.g., transite pipes or insulation on pipes). **If this project will include any of these activities, then it may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHA).** These requirements include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the SLOCAPCD Enforcement Division at (805) 781-5912 and also go to <http://slocleanair.org/business/asbestos.php> for further information. To obtain a Notification of Demolition and Renovation form go to the "Other Forms" section of: <http://slocleanair.org/business/onlineforms.php>.

Developmental Burning

Effective February 25, 2000, **the SLOCAPCD prohibited developmental burning of vegetative material within San Luis Obispo County.** If you have any questions regarding these requirements, contact the SLOCAPCD Enforcement Division at 781-5912.

Construction Phase Idling Limitations

The project is in close proximity to nearby sensitive receptors. Projects that will have diesel powered construction activity in close proximity to any sensitive receptor shall implement the following mitigation measures to ensure that public health benefits are realized by reducing toxic risk from diesel emissions:

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To help reduce sensitive receptor emissions impact of diesel vehicles and equipment used to construct the project, the applicant shall implement the following idling control techniques:

California Diesel Idling Regulations

- a. **On-road diesel vehicles** shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
 1. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
 2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.
- b. **Off-road diesel equipment** shall comply with the 5 minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use off-Road Diesel regulation.
- c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5 minute idling limit.
- d. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.

Truck Routing

Proposed truck routes should be evaluated and selected to ensure routing patterns have the least impact to residential dwellings and other sensitive receptors, such as schools, parks, day care centers, nursing homes, and hospitals. If the project has significant truck trips where hauling/truck trips are routine activity and operate in close proximity to sensitive receptors, toxic risk needs to be evaluated.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Gary Arcemont
Air Quality Specialist

cc: Tim Fuhs, Enforcement Division, SLOCAPCD
Paula Huddleston, Caltrans, Paula.Huddleston@dot.ca.gov

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SAN LUIS OBISPO COUNTY

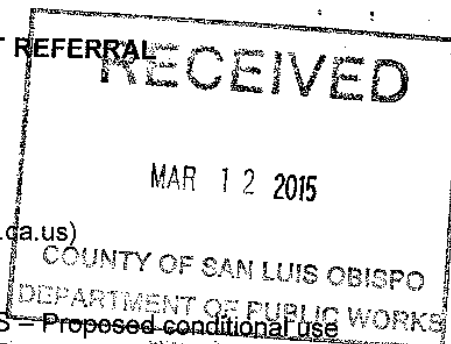
DEPARTMENT OF PLANNING AND BUILDING

THIS IS A NEW PROJECT REFERRAL

DATE: 3/4/2015

PR TO: PW

FROM: Schani Siong (805-781-4374 or ssiong@co.slo.ca.us)
Coastal Team / Development Review



PROJECT DESCRIPTION: DRC2014-00095 CALTRANS - Proposed conditional use permit/development plan to widen Highway 1 at Sheridan Rd to construct a two-way left turn channel and remove fixed objects within 20 feet of roadway. Site location is Highway 1 at Sheridan Rd. APN: 000-000-000

Return this letter with your comments attached no later than: 14 days from receipt of this referral. CACs please respond within 60 days. Thank you.

PART 1 - IS THE ATTACHED INFORMATION ADEQUATE TO COMPLETE YOUR REVIEW?

☒ YES
☐ NO

(Please go on to PART II.)

(Call me ASAP to discuss what else you need. We have only 10 days in which we must obtain comments from outside agencies.)

PART II - ARE THERE SIGNIFICANT CONCERNS, PROBLEMS OR IMPACTS IN YOUR AREA OF REVIEW?

☐ YES

(Please describe impacts, along with recommended mitigation measures to reduce the impacts to less-than-significant levels, and attach to this letter)

☒ NO

(Please go on to PART III)

PART III - INDICATE YOUR RECOMMENDATION FOR FINAL ACTION.

Please attach any conditions of approval you recommend to be incorporated into the project's approval, or state reasons for recommending denial.

IF YOU HAVE "NO COMMENT," PLEASE SO INDICATE, OR CALL.

No concerns. Recommend center left turn lane be
extended further to conform with exist cctl at
Willow Road

Date

3.13.15

Name

Chen Marshall

Phone

781-1596

COUNTY GOVERNMENT CENTER • SAN LUIS OBISPO • CALIFORNIA 93408 • (805)781-5600

EMAIL: planning@co.slo.ca.us • FAX: (805) 781-1242 • WEBSITE: <http://www.sloplanning.org>



SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING

THIS IS A NEW PROJECT REFERRAL

DATE: 3/4/2015

TO:

Gen Services - Parks

FROM: Schani Siong (805-781-4374 or ssiong@co.slo.ca.us)
Coastal Team / Development Review

PROJECT DESCRIPTION: DRC2014-00095 CALTRANS – Proposed conditional use permit/development plan to widen Highway 1 at Sheridan Rd to construct a two-way left turn channel and remove fixed objects within 20 feet of roadway. Site location is Highway 1 at Sheridan Rd. APN: 000-000-000

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☐ NO (Call me ASAP to discuss what else you need. We have only 10 days in which we must obtain comments from outside agencies.)

PART II - ARE THERE SIGNIFICANT CONCERNS, PROBLEMS OR IMPACTS IN YOUR AREA OF REVIEW?

- ☐ YES (Please describe impacts, along with recommended mitigation measures to reduce the impacts to less-than-significant levels, and attach to this letter)
☐ NO (Please go on to PART III)

PART III - INDICATE YOUR RECOMMENDATION FOR FINAL ACTION.

Please attach any conditions of approval you recommend to be incorporated into the project's approval, or state reasons for recommending denial.

IF YOU HAVE "NO COMMENT," PLEASE SO INDICATE, OR CALL.

Please condition a 25' wide Trail easement for Juan Bautista De Anza trail. Location to be approved by County Parks + Recreation Dept.

3/18/15
Date

E. Kavanaugh
Name

781-4089
Phone



SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING

THIS IS A NEW PROJECT REFERRAL

DATE: 3/4/2015

TO: Cal Fire

FROM: Schani Siong (805-781-4374 or ssiong@co.slo.ca.us)
Coastal Team / Development Review

RECEIVED MAR 13 2015

PROJECT DESCRIPTION: DRC2014-00095 CALTRANS ~ Proposed conditional use permit/development plan to widen Highway 1 at Sheridan Rd to construct a two-way left turn channel and remove fixed objects within 20 feet of roadway. Site location is Highway 1 at Sheridan Rd. APN: 000-000-000

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☐ NO

(Please go on to PART II.)

(Call me ASAP to discuss what else you need. We have only 10 days in which we must obtain comments from outside agencies.)

PART II - ARE THERE SIGNIFICANT CONCERNS, PROBLEMS OR IMPACTS IN YOUR AREA OF REVIEW?

☐ YES

(Please describe impacts, along with recommended mitigation measures to reduce the impacts to less-than-significant levels, and attach to this letter)

☒ NO

(Please go on to PART III)

PART III - INDICATE YOUR RECOMMENDATION FOR FINAL ACTION.

Please attach any conditions of approval you recommend to be incorporated into the project's approval, or state reasons for recommending denial.

IF YOU HAVE "NO COMMENT," PLEASE SO INDICATE, OR CALL.

CAL FIRE / SLO COUNTY FIRE HAS NO CONCERN WITH FIRE OR LIFE SAFETY,

Date

3/13/15

Name

TRAVIS CRAIG

Phone

593-3427

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EMAIL: planning@co.slo.ca.us • FAX: (805) 781-1242 • WEBSITE: <http://www.sloplanning.org>